

## **Deposition of Massad F. Ayoob**

**Oregon Firearms Federation, Inc., et al. v. Brown, et al.**

**January 16, 2023**



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## Oregon Firearms Federation, Inc., et al. v. Brown, et al.

Massad F. Ayoob

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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

OREGON FIREARMS FEDERATION, )  
INC., et al., )  
 )  
Plaintiffs, ) Case Nos.  
v. ) 2:22-cv-01815-IM  
 ) 3:22-cv-01859-IM  
 ) 3:22-cv-01862-IM  
 ) 3:22-CV-01869-IM  
 )  
KATE BROWN, et al., )  
 )  
Defendants. )  
 )  
 )  
 )  
 )  
(Continued) )

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## \* VIDEOCONFERENCE \*

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION

## OF EXPERT

MASSAD F. AYOOB

Witness located in:  
Live Oak, Florida

\* All participants appeared via videoconference \*

DATE TAKEN: January 16, 2023

REPORTED BY: Tia B. Reidt, Washington RPR, CCR 2798  
Oregon # 22-0001

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MARK FITZ, et al., )  
Plaintiffs, )  
v. )  
ELLEN F. ROSENBLUM, et al., )  
Defendants. )  
KATERINA B. EYRE, et al., )  
Plaintiffs, )  
v. )  
ELLEN F. ROSENBLUM, et al., )  
Defendants. )  
DANIEL AZZOPARDI, et al., )  
Plaintiffs, )  
v. )  
ELLEN F. ROSENBLUM, et al., )  
Defendants. )

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1 APPEARANCES  
2

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1 APPEARANCES CONTINUED

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9  
10 Also present:

11 Mr. Massad Ayoob's wife

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Ex. 1 - Wilson Decl.

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1 BY MS. HOFFMAN:

2 Q. Mr. Honeycutt is the next paragraph. I was  
3 asking about the South Carolina gun store owner.

4 A. Okay.

5 That one is also -- he's not one that I  
6 interviewed, and that was from a WIS TV dated  
7 August 9th, 2012.8 Q. So the citations you gave me are also in your  
9 declaration, and they're news stories. How did you  
10 find those news stories?11 A. Wow. I don't know -- I don't recall whether I  
12 got those from attorneys or, you know, when you're in  
13 my business, people are always sending you links to  
14 this, that, and the other news story that either  
15 supports or opposes your position.16 So I honestly don't recall. It may have come  
17 simply from a Google search.18 Q. Did you ever interview either the Baltimore  
19 man or the South Carolina gun store owner?

20 A. Not those two, no.

21 Q. Do you know their names?

22 A. I do not. Not off the top of my head. I'm  
23 sure we could look -- (inaudible Zoom audio.)

24 (Reporter clarification.)

25 THE WITNESS: I said I do not know them

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1 of larger revolvers with six rounds and semiautomatic  
2 pistols with higher capacity.

3 Q. Thanks.

4 Stepping back to the bigger picture a little  
5 bit, when you were putting your declaration together,  
6 how did you select the examples that you reference in  
7 here?

8 A. Just as they came to me, really.

9 Q. What do you mean as they came to you?

10 A. Well, the question is where are situations --  
11 what situations can you think of where someone needed  
12 more than 10 rounds, and as they occurred to me, they  
13 point out --

14 Q. So as they came to mind? As -- as they came  
15 to your mind?

16 A. Correct. Correct. There was some that I had  
17 written about before, so they were the ones that --  
18 (inaudible Zoom audio.)

19 (Reporter clarification.)

20 THE WITNESS: They were the ones I had  
21 written about in the past, so they were the ones that  
22 occurred to me.

23 BY MS. HOFFMAN:

24 Q. And in total, how many incidents do you cite  
25 in this declaration?

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1 C E R T I F I C A T E

2

3 STATE OF WASHINGTON

4 COUNTY OF PIERCE

5

6 I, Tia Reidt, a Certified Court Reporter in and  
7 for the State of Washington, do hereby certify that the  
8 foregoing transcript of the deposition of MASSAD F.  
9 AYOOB, having been duly sworn, on January 16, 2023, is  
10 true and accurate to the best of my knowledge, skill and  
11 ability.

12 IN WITNESS WHEREOF, I have hereunto set my hand  
13 and seal this 23rd day of January, 2023.

14  
15  
16   
17



18 /S/ Tia B. Reidt  
19 Tia B. Reidt, RPR, CCR 22-0001  
NOTARY PUBLIC, State of  
Washington.  
My commission expires  
5/15/2026.

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